

I wish to support the American Radio Relay League's petition for amendment of Parts 2 and 97 of the Commission's rules regarding a secondary domestic allocation of a band near 5 MHz for the Amateur Radio Service (RM-10209). The allocation is needed to fill a gap between the ionospheric propagation paths provided by the current allocations in the 3.5-4 MHz and 7-7.3 MHz bands.

The 3.5-4 MHz band often is too low in frequency for good ionospheric propagation even as the 7-7.3 MHz band is too high. Considering that amateur stations use relatively low power and digital modulation which requires low multipath delay, the usable operating frequencies should be near the maximum usable frequency for a desired path and time.

When 3.5-4 MHz has excessive atmospheric noise, manmade noise, interference limiting the reliability of digital signals, or pulse blurring from multipath distortion which degrades analog modulated signals such as single-sideband radiotelephony, the proposed 5.25-5.4 MHz band often provides optimum propagation characteristics, especially during the summer months.

I am an Amateur Radio operator (K3RXK) with more than four decades in Emergency preparedness work and extensive experience in communications Operations during emergencies. As a former ARRL Section Emergency Coordinator for Maryland and the District of Columbia, where hurricane preparedness is an annual concern, I have observed poor propagation paths on the 3.5-4 and 7-7.3 MHz bands disrupting emergency communications during hurricanes and other severe weather disasters up and down the East Coast and into the Caribbean. I believe that, during such extreme weather emergencies, an allocation at 5.25-5.4 MHz would offer a path for successful emergency communications.

In addition to the propagation issue and its relationship to emergency communications, an additional band at 5.25-5.4 MHz would relieve the substantial daily overcrowding on the 3.5-4 and 7-7.3 MHz bands.